

R4

Habitat Regulations Assessment

London Plan: Changes in Response to Secretary of State Modifications

Greater London Authority

December 2020

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Hannah Corrigan Graduate Ecologist	Dr James Riley Technical Director	Max Wade Technical Director	Dr James Riley Technical Director

Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Authorized</u>	<u>Name</u>	<u>Position</u>
01	07/05/20	Draft	JR	James Riley	Technical Director
02	08/12/20	Draft	JR	James Riley	Technical Director

Distribution List

<u># Hard Copies</u>	<u>PDF Required</u>	<u>Association / Company Name</u>

Prepared for:

Greater London Authority

Prepared by:

AECOM Infrastructure & Environment UK Limited
Midpoint, Alencon Link
Basingstoke
Hampshire RG21 7PP
United Kingdom

T: +44(0)1256 310200
aecom.com

© 2020 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1. Introduction.....	5
2. Likely Significant Effects of Changes Made to the London Plan In Response to Secretary of State’s Directions	6
3. Conclusion.....	21

Tables

Table 1. Likely Significant Effects of Changes to London Plan in Response to Secretary of State Directions	7
--	---

1. Introduction

- 1.1 AECOM was appointed by the Greater London Authority (hereafter referred to as the 'GLA') to assist the Authority in undertaking a Habitat Regulations Screening Assessment of its Draft London Plan (hereafter referred to as the 'Plan'). The objective of this assessment is to identify any aspects of the Plan that would cause a likely significant effect or adverse effect on the integrity of any Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 The London Plan and its HRA were consulted upon during December 2017 and March 2018. A small number of comments were received on the HRA from Natural England. As a result of the consultation, the Mayor prepared a series of Minor Suggested Changes to the London Plan and the HRA was updated based on these changes. During the Examination, the Mayor proposed Further Suggested Changes and a Consolidated Plan was published in July 2019. Following receipt of the Inspectors' Recommendations further a further set of changes were made to the Plan. As a result, the HRA was further updated in December 2019 to identify whether any of the Modifications as a result of the Further Suggested Changes or the changes in response to the Inspectors' recommendations altered the conclusions of the HRA. That report determined that the conclusions of the HRA remained valid.
- 1.3 In March 2020 the Secretary of State for Housing, Communities and Local Government has made several directions regarding London Plan policy such that it more closely reflects national planning policy. In response to those directions amendments have been made to the London Plan to make those changes more workable in practice. It is therefore necessary for the proposed changes to be assessed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the Intend to Publish London Plan. That is the purpose of this report.
- 1.4 It should therefore be noted that this report should be considered an Addendum to the HRA of the London Plan issued in December 2019. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or appropriate assessment, including the 'in combination' assessment. Instead it focusses specifically on whether the Secretary of State's directions and modifications on the directions proposed by the Mayor will result in likely significant effects on any European sites.

2. Likely Significant Effects of Changes Made to the London Plan In Response to Secretary of State's Directions

- 2.1 This section sets out the assessment of each direction. The direction is numbered in the first column of the table with the relevant London Plan reference and the Mayor's modification in the second and third column. The assessment of likely significant effects is then presented in the fourth column.

Table 1. Likely Significant Effects of Changes to London Plan in Response to Secretary of State Directions

Direction	London Plan Ref	Tracked change text	Likely Significant Effect
DR8	Paragraph 0.0.21	The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way and has been found sound by the planning inspectors through the examination in public. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development, unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.	No Likely Significant Effect – changes to the introductory text of the London Plan pose no risk to European sites
DR4	Paragraph 2.1.16	Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should plan for no net loss of industrial floorspace capacity and set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing creative industries should also be protected and supported.	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Paragraph 2.1.33	The Planning Framework should quantify the full development potential of the area as a result of Crossrail 2. It should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, with no net loss of industrial floorspace capacity, and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of creative industries which should be protected and supported. The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Paragraph 2.1.53	Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.

DR4	Paragraph 2.1.56	Industrial and logistics uses will continue to play a significant role in the area. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. Belvedere is recognised as having potential as a future District centre.	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR2	Policy D3 (A) and part of (B)	<p>The design-led approach</p> <p>A All development must make the best use of land by following a designed approach that optimises the capacity of sites, including site allocations. <u>Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.</u> The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in <u>Policy D2 Infrastructure requirements for sustainable densities</u>), and that best delivers the requirements set out in Part <u>D B</u>.</p> <p><u>B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.</u></p> <p><u>C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2. B D</u> Development proposals should:</p>	No Likely Significant Effect – whilst the terminology has changed, the overall approach remains similar. In addition, densification presents no mechanism to affect European sites as the quantum (rather than density) of development is a more relevant consideration
DR2	Paragraph 3.3.1	For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land <u>by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs. The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.</u> The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as <u>Gg</u> ypsy and <u>Tt</u> raveller pitches – is the optimum development for the site.	No Likely Significant Effect – whilst the terminology has changed, the overall approach remains similar.
DR11	Paragraphs 4.1.11 to 4.1.13	4.1.11 Given that London Plan targets have increased significantly from the last London Plan to deliver more of the homes that Londoners need, it is the Mayor's view that the Government's housing delivery test should not unfairly penalise boroughs where housing delivery has been constrained due to factors that are outside their control. For example, where key allocations or approval sites are expected to make a significant contribution to housing targets but have stalled due to non-planning related reasons, or will come forward later in the 10-year period. Housing completions against the London Plan small sites target are also likely to increase over time, as Policy H2 Small sites	No Likely Significant Effect – deleting supporting text presents no mechanism to affect European sites

		<p>is implemented, so this should be taken into account when monitoring housing delivery during the early years of the Plan.</p> <p>4.1.12 If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.</p> <p>4.1.123 As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.</p>	
DR3	Paragraphs 4.2.12 and 4.2.13	<p>4.2.12 As demonstrated by the 2017 SHMA, London has significant unmet need for affordable housing. For many boroughs, developments of nine or fewer units are a significant source of housing supply and play an important role in contributing to affordable housing delivery, often via cash in lieu contributions which are then used as part of borough-wide affordable housing programmes. Given the important role these sites play, the Mayor believes that boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites. Therefore, boroughs are encouraged to require affordable housing contributions from developments of nine or fewer units where supported by local evidence.</p> <p>4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), affordable housing requirements from developments of nine or fewer units should be asked for as a cash in lieu contribution, rather than as an on-site contribution, and boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development in these instances. Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs.</p>	No Likely Significant Effect -- deleting supporting text presents no mechanism to affect European sites
DR3	Paragraph 4.2.14	Renumber as 4.2.11	No Likely significant Effect
DR4	Footnote 59 to paragraph 4.5.7	Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater. For the purposes of Policy H5 Threshold approach to applications, this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required, regardless of the provisions of paragraph 6.4.8. However, it is recognised that some surplus utilities sites are subject to substantial	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.

		decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.	
DR1	Policy H10 (A)(9)	the need for additional family housing and the role of one and two bed units in freeing up existing family housing.	No Likely Significant Effect – these minor changes pose no risk to European sites
DR7	Policy H14	<p>A Boroughs should plan to meet the identified need for permanent Ggypsy and Ttraveller pitches and must include ten-year pitch targets in their Development Plan Documents.</p> <p>B As of the start of this Plan period, boroughs should use the following definition of ‘Gypsies and Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, a nomadic habit of life, or living in a caravan, whatever their race or origin, including:</p> <p>1) those who are currently travelling or living in a caravan</p> <p>2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation</p> <p>3) those who, on grounds of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently.</p> <p>C Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for Ggypsy and Ttraveller accommodation provided in Table 4.4 as identified need for pitches until a needs assessment, using the definition set out above, is undertaken as part of their Development Plan review process.</p> <p>CD Boroughs that have undertaken a needs assessment since 2008 should update this based on the definition set out above as part of their Development Plan review process.</p> <p>DE Boroughs should undertake an audit of existing local authority provided Ggypsy and Ttraveller sites and pitches, working with residents occupying these, identifying:</p> <ol style="list-style-type: none"> 1) areas of overcrowding 2) areas of potential extra capacity within existing sites 3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping). <p>EF Boroughs should plan to address issues identified in the audits.</p> <p>FG Boroughs should actively plan to protect existing Ggypsy and Ttraveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.</p>	No Likely Significant Effect – text amendments are minor and will not change the effects of the London Plan regarding European sites.
DR7	Paragraphs 4.14.1 to 4.14.13 including footnote 74	4.14.1—Estimates show there are around 30,000 Gypsies and Travellers in London.⁷⁴ Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies and Travellers try to maintain this, the lack of pitches on local authority sites often presents a barrier to this. Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on	No Likely Significant Effect – text amendments are minor and will not change the effects of the London Plan regarding European sites.

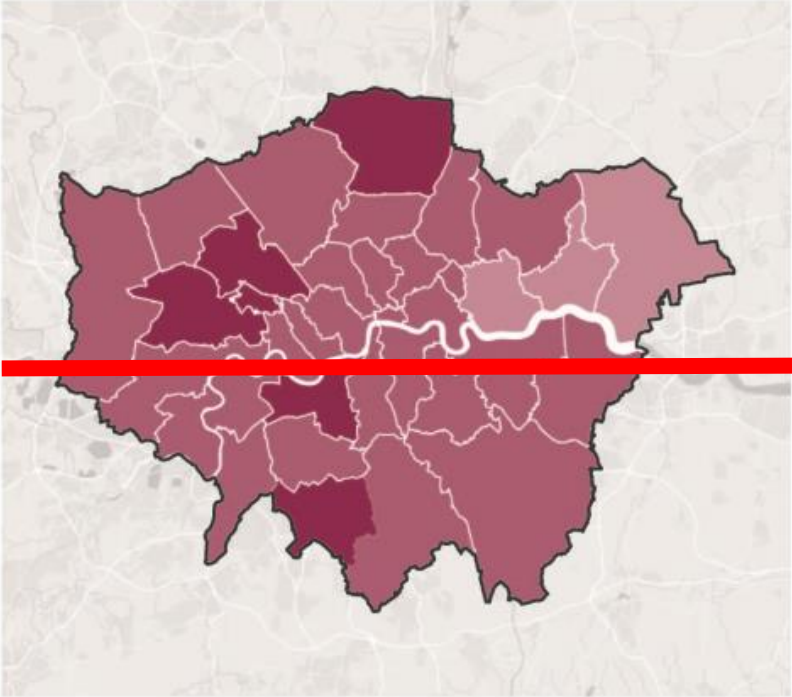
	<p>roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches. The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer. ⁷⁴: http://www.londongypsiesandtravellers.org.uk/why-were-needed/</p> <p>4.14.2 In this Plan, the Mayor has adopted a new definition for Gypsies and Travellers. This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:</p> <ul style="list-style-type: none"> — • Gypsies and Travellers who have ceased to travel permanently due to a lack of available permanent pitches, transit sites or stopping places; frequent enforcement action (evictions); or lack of opportunities and barriers to work — • Gypsies and Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site provision; or — • due to their own or their family’s or dependants’ educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single parents). <p>4.14.3 For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current Government planning definition) because there are no viable options or because doing so would have a significant impact on their health, wellbeing and security of income.</p> <p>4.14.4 This often results in Gypsies and Travellers not being recognised or counted in needs assessments, with many needs assessments identifying zero need. This has a direct impact on the accommodation options available to Gypsies and Travellers and their ability to retain their cultural status and identity, which can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.</p> <p>4.14.7 The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches.</p> <p>4.14.19 Boroughs should actively plan for Gypsy and Travellers’ accommodation needs, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.</p> <p>4.14.28 The Mayor will initiate and lead a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. Until the findings of this new London-wide needs assessment are available for use in Development Plans boroughs should continue to plan to meet the need for permanent Gypsy and Traveller pitches in accordance with the requirements of Policy H14, with a particular focus on Part BC.</p>	
--	--	--

		<p>4.14.45.35 Insufficient pitch provision can also lead to a rise in unauthorised encampments, with implications for the health and wellbeing of Ggypsy and Ttravellers, community cohesion and costs for boroughs.</p> <p>4.14.46 It is acknowledged that, in addition to permanent sites, suitable short-term sites are an important component of the suite of accommodation for Ggypsy and Ttravellers. Research is currently underway to understand how a 'negotiated stopping' approach could work in London as a way of minimising the number of unauthorised encampments.</p> <p>4.14.510 To assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.</p> <p>4.14.614 Where new Ggypsy and Ttraveller pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.</p> <p>4.14.712 If existing Ggypsy and Ttraveller pitches or Travelling Showpeople's or circus people's sites or plots have to be re-located or re-provided within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.</p> <p>4.14.813 The requirements of H14 are in addition to the duties under Section 124 of the Housing and Planning Act 2016, which require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of both sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.</p>	
DR4	Policy E4(C) including footnote 103	<p>The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial¹⁰³ floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in <u>Policy E7 Industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Locations (SIL).</u></p> <p>¹⁰³ Defined as the overall range of uses set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function</p>	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.

DR4	Paragraph 6.4.5 including footnote 108	<p>Based upon this evidence, this Plan addresses the need to retain provide sufficient industrial, logistics and related capacity through its policies, by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio¹⁰⁸ (whichever is the greater).</p> <p>¹⁰⁸ Defined as total proposed industrial floorspace (see Part A), divided by the total proposed site area. Source: London Employment Sites Database, CAG Consultants, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites</p>	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Paragraphs 6.4.6 to 6.4.11 including footnote 110	<p>6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.</p> <p>6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable ‘last mile’ distribution/ logistics, ‘just-in-time’ servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.</p> <p>6.4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</p> <p>6.4.6 When applying the principle of no net loss of industrial floorspace capacity regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.</p> <p>6.4.7 Some industrial uses may require a significant amount of yard and servicing space, such as cross-docking facilities. In some instances, this may provide exceptional justification for a plot ratio that is lower than 65 per cent on development for industrial uses only (those listed in Part A of this policy). For this exceptional approach to apply, it should be demonstrated that it is not feasible to achieve no net loss of industrial floorspace capacity through alternative configurations, multi-storey industrial development, a wider mix of industrial uses, or other appropriate means. This exceptional approach would not apply to industrial developments that are being proposed as part of the processes of SIL / LSIS consolidation and industrial / residential / non-industrial co-</p>	<p>No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.</p> <p>Individual proposals for the provision of ‘just in time’ servicing, intensified floorspace capacity or release of land for alternative uses may affect European sites, depending on the nature and specific location of those uses. Individual proposals in response to DR4 will therefore need to be evaluated for potential impacts on European sites as they come forward, in line with legislation and London Plan Policy G6 (Biodiversity and Access to Nature).</p>

		<p>location set out in Part B of Policy E7 Industrial intensification, co-location and substitution, including land swaps.</p> <p>6.4.8 — Mezzanine space should be excluded from calculations of industrial floorspace capacity. The principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them. The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required.</p> <p>6.4.9 — Guidance on the approach to be taken to the management of industrial floorspace capacity at borough level and across industrial property market areas is provided in Figure 6.1 and Table 6.2. Boroughs in the ‘Provide Capacity’ category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest.¹⁴⁹ They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water. Footnote ¹⁴⁹ CAG Consulting, London Industrial Land Demand Study, GLA 2017</p> <p>6.4.10 — Boroughs in the ‘Retain’ category should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. All boroughs in the Central Services Area fall within this category in recognition of the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable ‘last mile’ distribution/logistics, ‘just-in-time’ servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.</p> <p>6.4.11 — There are three boroughs in the ‘Limited Release’ category (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. These boroughs are encouraged to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach.</p>																	
DR4	Table 6.2	<p>Table 6.2 – Management of industrial floorspace capacity – industrial property market area and borough-level categorisations</p> <table border="1" data-bbox="477 1125 1314 1388"> <thead> <tr> <th>Property Market Area / Borough</th> <th>Categorisation</th> </tr> </thead> <tbody> <tr> <td>Central Services Area</td> <td>Central Services Area</td> </tr> <tr> <td>Camden</td> <td>Retain capacity</td> </tr> <tr> <td>City of London</td> <td>Retain capacity</td> </tr> <tr> <td>Hackney</td> <td>Retain capacity</td> </tr> <tr> <td>Islington</td> <td>Retain capacity</td> </tr> <tr> <td>Kensington & Chelsea</td> <td>Retain capacity</td> </tr> <tr> <td>Lambeth</td> <td>Retain capacity</td> </tr> </tbody> </table>	Property Market Area / Borough	Categorisation	Central Services Area	Central Services Area	Camden	Retain capacity	City of London	Retain capacity	Hackney	Retain capacity	Islington	Retain capacity	Kensington & Chelsea	Retain capacity	Lambeth	Retain capacity	No likely significant effects – deletion of text will not result in effects on European sites
Property Market Area / Borough	Categorisation																		
Central Services Area	Central Services Area																		
Camden	Retain capacity																		
City of London	Retain capacity																		
Hackney	Retain capacity																		
Islington	Retain capacity																		
Kensington & Chelsea	Retain capacity																		
Lambeth	Retain capacity																		

		Lewisham	Retain capacity	
		LLDC	Retain capacity	
		Southwark	Retain capacity	
		Tower Hamlets	Retain capacity	
		Westminster	Retain capacity	
		Thames Gateway		
		Barking & Dagenham	Limited release	
		Bexley	Retain capacity	
		Bromley	Retain capacity	
		Greenwich	Retain capacity	
		Havering	Limited release	
		Newham	Limited release	
		Redbridge	Retain capacity	
		Lee Valley		
		Enfield	Provide capacity	
		Haringey	Retain capacity	
		Waltham Forest	Retain capacity	
		Park Royal/Heathrow		
		Barnet	Retain capacity	
		Brent	Provide capacity	
		Ealing	Provide capacity	
		Hammersmith & Fulham	Retain capacity	
		Harrow	Retain capacity	
		Hillingdon	Retain capacity	
		Hounslow	Retain capacity	
		OPDC	Provide capacity	
		Richmond	Retain capacity	
		Wandle Valley		
		Croydon	Retain capacity	
		Kingston	Retain capacity	
		Merton	Retain capacity	
		Sutton	Provide capacity	
		Wandsworth	Provide capacity	

<p>DR4</p>	<p>Figure 6.1</p>	<p>Figure 6.1 – Management of industrial floorspace capacity – borough level categorisations</p>  <p>Management of Industrial Floorspace Capacity – Borough Level Categorisations</p> <ul style="list-style-type: none"> ● Provide Capacity ● Retain Capacity ● Limited Release <p>Source: GLA Planning</p> <p>Contains OS data © Crown copyright and database right (2017)</p>	<p>No likely significant effects – deletion of a map will not pose a likely significant effect to European sites</p>
<p>DR4</p>	<p>Policy E5(B)(4)</p>	<p><u>4) strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.</u></p>	<p>No Likely Significant Effect – Individual proposals for the provision of ‘just in time’ servicing, intensified floorspace capacity or release of land for alternative uses may affect European sites, depending on the nature and specific location of those uses. Individual proposals in response to DR4 will therefore need to be evaluated for potential impacts on European sites as they come forward, in line with legislation and London Plan Policy G6 (Biodiversity and Access to Nature).</p>

DR4	Policy E5(D) including renumbering of E5(E) as E5(D)	<p>Development proposals for uses in SILs other than those set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.</p> <p>E</p>	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Policy E7(C)	... Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part Ds D2 to D4 below.	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Policy E7(D)	<p>The processes set out in Parts B and C above must ensure that:</p> <p>1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing</p> <p>2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements</p> <p>3) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied</p> <p>4) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:</p> <ol style="list-style-type: none"> safety and security the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict design quality, public realm, visual impact and amenity for residents agent of change principles vibration and noise air quality, including dust, odour and emissions and potential contamination. 	No Likely Significant Effect – the deleted text does not create a mechanism for the London Plan to affect European sites.
DR4	Paragraph 6.7.2	<p>Whilst the majority of land in SILs should be retained and intensified for the industrial-type functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, there may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach (in accordance with Parts B and D of Policy E7¹ Industrial intensification, co-location and substitution) to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential.</p>	No Likely Significant Effect – the changes are minor and do not create a mechanism for the London Plan to affect European sites.

¹ See also paragraphs 6.4.5 to 6.4.8 for definition of industrial floorspace capacity

		Local Plan policies' maps and/or OAPFs and masterplans (<u>as relevant</u>) should indicate clearly: i. the area to be retained, <u>substituted</u> and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in <u>Policy E5 Strategic Industrial Locations (SIL)</u> and <u>Policy E6 Locally Significant Industrial Sites</u>) and ii. the area to be released from SIL or LSIS (see illustrative examples in Figure 6.3). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.														
DR5	Policy G2	A The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused <u>except where very special circumstances exist</u> 2) <u>subject to national planning policy tests</u> , the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. B <u>Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.</u>			No Likely Significant Effect – the additional text linking to national policy does not pose a risk to any European sites											
DR6	Policy G3(A)	Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: 1) Development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt 2) boroughs should work with partners to enhance the quality and range of uses of MOL.			No Likely Significant Effect – the deletion of the red text does not pose a risk to any European sites											
DR6	Policy G3(C)	Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, <u>taking into account the purposes for including land in MOL set out in Part B ensuring that the quantum of MOL is not reduced, and that the overall value of the land designated as MOL is improved by reference to each of the criteria in Part B.</u>			No Likely Significant Effect – the replacement of the red text does not pose a risk to any European sites											
DR9	Table 10.3	<table border="1"> <thead> <tr> <th>Location</th> <th>Number of beds</th> <th>Maximum parking provision</th> </tr> </thead> <tbody> <tr> <td>Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4</td> <td>All</td> <td>Car free~</td> </tr> <tr> <td>Inner London PTAL 3</td> <td></td> <td>Up to 0.25 spaces per dwelling</td> </tr> <tr> <td>Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas</td> <td></td> <td>Up to 0.5 spaces per dwelling</td> </tr> </tbody> </table>	Location	Number of beds	Maximum parking provision	Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free~	Inner London PTAL 3		Up to 0.25 spaces per dwelling	Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas		Up to 0.5 spaces per dwelling		No Likely Significant Effect – These changes will not alter the conclusions of the transport and air quality analysis on which the London Plan HRA was based as changes to parking standards do not pose any direct link to European sites
Location	Number of beds	Maximum parking provision														
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free~														
Inner London PTAL 3		Up to 0.25 spaces per dwelling														
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas		Up to 0.5 spaces per dwelling														

		<p>Inner London PTAL 0 – 1 Outer London PTAL 3</p> <p>Outer London PTAL 4</p> <p>Outer London PTAL 4</p> <p>Outer London PTAL 2 – 3</p> <p>Outer London PTAL 2 – 3</p> <p>Outer London PTAL 0 – 1</p> <p>Outer London PTAL 0 – 1</p> <p>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed ~ With the exception of disabled persons parking, see Part G <u>Policy T6.1 Residential Parking</u> * When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum. ^ Boroughs should consider alternative standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing. Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit</p>	<p>Up to 0.75 spaces per dwelling</p> <p>1 – 2</p> <p>3+</p> <p>1 – 2</p> <p>3+</p> <p>1 – 2</p> <p>3+</p> <p>Up to 1.5 spaces per dwelling ^</p>	<p>Up to 0.5 - 0.75 spaces per dwelling*</p> <p>Up to 0.5 - 0.75 spaces per dwelling*</p> <p>Up to 0.75 spaces per dwelling</p> <p>Up to 1 space per dwelling</p> <p>Up to 1.5 space per dwelling</p>	
DR10	Policy T6.3(A)	The maximum parking standards set out in Table 10.5 should be applied to new retail development, unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in <u>Policy SD7 Town centres: development principles and Development Plan Documents.</u>		No Likely Significant Effect - These changes will not alter the conclusions of the transport and air quality analysis on which the London Plan HRA was based as changes to parking standards do not pose any direct link to European sites	
DR10	Policy T6.3(G) NEW	G. Boroughs may consider alternative standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in: a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach. b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.		No Likely Significant Effect - These changes will not alter the conclusions of the transport and air quality analysis on which the London Plan HRA was based as changes to parking standards do not pose any direct link to European sites	
DR11	Policy D9	<p>Policy D9 Tall buildings</p> <p>Definition A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p>		No Likely Significant Effect - These changes will not alter the conclusions of the London Plan HRA as the changes involved simply allow for further controls on tall buildings, including identifying particularly sensitive areas and confirming that very tall buildings outside specifically identified areas will normally be refused. These changes do not pose any risk to European sites.	

		<p>Locations</p> <p>B 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p> <p>2) Any such locations and appropriate tall building heights should be identified in maps in Development Plans.</p> <p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p> <p>3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey, 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.</p>	
DR4 (amended)	Policy E4 Land for industry	<p>4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policies G2 London's Green Belt and G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land that is in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</p>	No Likely Significant Effect – this change to wording is sufficiently broad that it cannot be linked to Likely Significant Effects on any European sites.

3. Conclusion

- 3.1 Following the assessment of the modification to the London Plan in response to the Secretary of State's directions (as well as the Mayor's changes to those directions) it can be concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the London Plan.

